



Loudoun County, Virginia

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Department of Information Technology

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6 July 2007

Federal Communications Commission

Marline Dortch, Secretary

445 12th St., SW

Washington, DC 20554

RE: 700 MHz Public Safety Data Spectrum Concerns

REF: WT Docket 96-86, FCC 07-72 (FNPRM)

Ms. Dortch,

Please accept these brief late filed Comments on the Commissions recent Further Notice of Proposed Rule Making.

I am the Communications Systems Supervisor responsible for public safety communications in Loudoun County, VA, one of the fastest growing counties in the United States. I have read with interest the Comments and Reply Comments filed on this docket and fell compelled to share some concerns arising from this review.

Currently our county builds public safety communications sites with many features we deem necessary to ensure uninterrupted services for our first responders. All our sites have both battery back-up (UPS) and generators to ensure each site can be self sufficient for at least one week. I have concerns that any commercial entity that has to remain commercially solvent while simultaneously supporting public safety users, to a public safety standard level of service, may be tempted to "cut corners" in the build quality of network facilities by eliminating battery back-up and/or generators at their sites. I have spent the last decade on over one- hundred (100) sites shared between commercial and public safety entities. Commercial companies DO NOT provide battery back-up and generators on over 95% of their sites. They say that they deploy generators on an "as needed basis", but this is impractical as most power outages are typically resolved before the generator can be deployed. Of course, critical public safety communications would be lost. Additionally, if there were a severe power outage, the commercial entities would not be able to provide a sufficient quantity of generators to keep a region operational.


I am also concerned about the Commissions plans to place control and licensing of 700 MHz public safety data spectrum in the hands of a "National Licensee", especially when

combined with the tentative conclusion that the winning bidder of the proposed "E" block would also be permitted to use the existing 10 MHz of public safety data spectrum mandated for our use by Congress.

Because of the uncertainties inherent with the Frontline proposal, Loudoun County encourages the Commission to maintain the right for County and Local governments to be licensed to build and operate our own 700 MHz broadband networks. We are closest to and best understand the requirements of our public safety personnel.

Please contact me if you require additional information or wish to discuss these concerns.

Sincerely,

A handwritten signature in black ink, reading "Gary McKelvey". The signature is fluid and cursive, with the first name "Gary" and last name "McKelvey" clearly distinguishable.

Gary McKelvey
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